

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

THE ROMAN CATHOLIC DIOCESE OF  
ROCKVILLE CENTRE, NEW YORK,

Debtor.

Chapter 11

Case No. 20-12345 (MG)

**DECLARATION OF BRITTANY M. MICHAEL IN SUPPORT OF  
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' MOTION TO  
AMEND CLAIMS OBJECTION PROCEDURES ORDER**

Pursuant to 28 U.S.C. sec. 1746, I, Brittany M. Michael, hereby submit this declaration (the "**Declaration**") under penalty of perjury:

1. I am of counsel at the law firm of Pachulski Stang Ziehl & Jones LLP ("**PSZJ**") with an office at 780 Third Avenue, 36<sup>th</sup> Floor, New York, NY 10017. I am duly admitted to practice law in the United States District Courts for the Southern and Western Districts of New York and the District of Minnesota.

2. Unless otherwise stated in this Declaration, I have personal knowledge of the facts set forth herein. If called as a witness, I would testify as to those facts.

3. The Court has approved PSZJ's employment as counsel to the Official Committee of Unsecured Creditors (the "**Committee**") in The Roman Catholic Diocese of Rockville Centre, New York (the "**Diocese**" or the "**Debtor**") in the above-captioned case (the "**Case**") [Docket No. 163].

4. I submit this Declaration in support of the *Official Committee of Unsecured Creditors' Motion to Amend Claims Objection Procedures* to which this Declaration is appended.

5. Attached as **Exhibit 1** is a true and correct copy of a letter from James Stang to Corinne Ball, dated June 9, 2023.

6. Attached as **Exhibit 2** is a true and correct copy of a letter from Corinne Ball to James Stang, dated June 13, 2023.

Pursuant to 28 U.S.C. sec. 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of knowledge and belief. I executed this Declaration on June 13, 2023 at Minneapolis, Minnesota.

By: /s/ Brittany M. Michael  
Brittany M. Michael

**EXHIBIT 1**



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James I. Stang

June 9, 2023

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[jstang@pszjlaw.com](mailto:jstang@pszjlaw.com)

**Via E-mail (cball@jonesday.com)**

Corinne Ball, Esq.  
Jones Day  
250 Vesey Street  
New York, NY 10281

**Re: In re. The Roman Catholic Diocese of Rockville  
Centre, New York Case No. 20-12345**

Dear Corinne:

We write in our role coordinating the responses to the Debtor's objections to claims. In light of the Diocese's position that it is not liable to certain claimants as well as the Court's recent decisions disallowing certain claims with prejudice, the Committee is requesting that the Diocese stipulate to an amendment to the Amended Claims Objection Procedures Order (Doc. No. 1679) that allows such claimants to proceed with their state court actions.

Specifically, the Committee requests the Diocese consent to the following addition to the Amended Claims Objection Procedures Order:

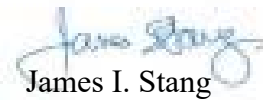
If the Court disallows a claim with prejudice, such Claimant is granted relief from the automatic stay, to the extent such relief is necessary, to sever the Diocese from any pending state court actions. Further, the claimant's state court action is automatically released from any stay on litigation against non-debtors in place in the bankruptcy case.



Corinne Ball, Esq.  
June 9, 2023  
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Please respond to this request no later than Tuesday, June 13, 1 pm ET.

Very truly yours,



James I. Stang

cc (via email):  
Todd Geremia  
Benjamin Rosenblum  
Andrew M. Butler

**EXHIBIT 2**

JONES DAY

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JP002419:

June 13, 2023

James Stang, Esq.  
Pachulski Stang Ziehl & Jones LLP  
150 California Street  
15<sup>th</sup> Floor  
San Francisco, CA 94111-4500

Re: The Roman Catholic Diocese of Rockville Centre, New York No. 20-12345  
(Bankr. S.D.N.Y.) (M.G.)

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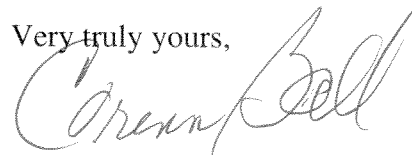
Dear Jim:

We are in receipt of your letter of June 9, 2023 in which you, as Committee Counsel, seek to assist, if not obtain, relief from the automatic stay for certain claimants represented by counsel in the CVA suits. Given the Committee's fiduciary obligations to creditors of the estate, your firm should have no role in the defense of any objection or seeking stay relief following the adjudication of same.

We will respond to any requests for stay relief from individual claimants or their counsel as and when they arise. The Debtor does not believe that the claims procedures order should be amended, as you suggest, nor does the Debtor believe that the Committee's efforts on behalf of certain state court lawyers, including ghost-writing portions of their responses to the Debtor's claim objections, is an appropriate role for a fiduciary, such as the Committee.

All rights reserved.

Very truly yours,



Corinne Ball

Cc (via email):

Karen B. Dine, Esq.  
Brittany M. Michael, Esq.  
Todd Geremia, Esq.  
Benjamin Rosenblum, Esq.  
Andrew Butler, Esq.

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